

The requested redactions are GRANTED.
By **Wednesday, March 31, 2021**
Defendants shall file redacted versions of
ECF Nos. 356, 357 and 363, redacting
anything referencing the disciplinary history
of Plaintiff Mascol, as well as any alleged
misconduct.

The Clerk of Court is directed to close ECF
No. 369.

SO ORDERED 3/29/2021

March 26, 2021

VIA ECF

The Honorable Sarah L. Cave, U.S.M.J.
United States District Court, Southern District of New York
500 Pearl Street, Room 702
New York, NY 10007


SARAH L. CAVE
United States Magistrate Judge

Re: Local 3621, et al v. City of New York, et al; Index No. 18-cv-04476 (LJL)(SLC)

Your Honor:

We write with regards to the Court's Orders dated March 16, 2021 [ECF No. 362] and March 18, 2021 [ECF No. 367] to request that the Court resolve the outstanding issue of the scope of redaction for Defendants' opposition to class certification [ECF Nos. 356 and 357] and opposition to hold Plaintiffs' reply in abeyance [ECF No. 363] to comport with the Court's March 18, 2021 order.

On March 16, 2021, the Court ordered that "[b]y March 26, 2021, the parties must meet and confer on the scope of redactions to the public version of Defendants' class certification opposition papers and submit updated version on the docket" [ECF No. 362]. Soon thereafter, on March 18, 2021, the Court ruled that for Plaintiffs' upcoming motion to strike and preclude "[a]nything referencing the disciplinary history of Plaintiff Captain Mascol, as well as any alleged misconduct must be redacted in public filings" [ECF No. 367].

Given that the Court has now ruled on this issue it seems prudent that the redactions to these additional documents follow the same protocols. As such, Plaintiffs' counsel forwarded the Court's Order to Defendants' counsel and stated that "[g]iven the scope ordered by the Court today for redactions in our upcoming motion to strike, we ask that you agree to the same redactions for these two documents, namely that you redact anything referencing Captain Mascol's discipline as well as the allegations of misconduct related to them against both Plaintiff and Plaintiff's counsel" (**Exhibit A**, Emails with Defendants' counsel).

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However, Defendants' counsel has failed to respond to this email despite today's deadline. Defendants have also not filed an appropriately redacted version of the March 17, 2021 letter by the March 23, 2021 deadline directed by the Court. [ECF No. 367].

As such, because we have been unable to hear back from Defendants, so that the redactions are consistent for all documents, and to avoid the need for additional motion practice, Plaintiffs respectfully ask that this Court resolve the outstanding issue of scope of redactions in the Court's March 18, 2021 Order [ECF No. 367], by directing Defendants to file redacted versions of both their opposition to class certification [ECF No. 356-357] and their letter filed on March 17, 2021 [ECF No. 363] with the same redactions ordered for the upcoming motion to strike. In specific, that Defendants refile these documents with "[a]nything referencing the disciplinary history of Plaintiff Captain Mascol, as well as any alleged misconduct...redacted" [ECF No. 367].

Thank you in advance for your time and attention to this matter.

Respectfully Submitted,

/s/
Yetta G. Kurland